



AMERICAN COUNCIL OF ENGINEERING COMPANIES

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REPT OF TRANSPORTATION

June 5, 2002

U.S. Department of Transportation  
Dockets Management Facility  
Room PL-401  
400 Seventh Street, SW  
Washington, DC 20590

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**Re: FHWA Docket No. FHWA-2001-11130 – Work Zone Safety**

The American Council of Engineering Companies appreciates the opportunity to submit comments to the FHWA as it begins to consider revamping existing regulations regarding the design and safety of work zones.

Over the past six years, the increased funding provided under TEA-21 has resulted in more highway work, thereby increasing the number of work zones across the country. At the same time, the nature of highway projects has changed. A vast majority of projects currently underway are rebuilding, maintaining and reconstructing existing highway facilities. Undertaking work on roads that are still used by travelers is extremely difficult—akin to changing a tire while the vehicle is still moving.

As a result, more travelers are impacted by delays associated with work zones. Safety in and around work zones has also been compromised, with fatalities rising from 789 in 1995 to an all time high of 1,093 in 2000. While understandable, the rising trend in work zone accidents and fatalities is unacceptable. This clearly needs to be addressed.

As FHWA proceeds, the members of ACEC look forward to working with the agency and our industry partners in finding ways to increase mobility and safety in the nation's work zones. Below are some issues we ask FHWA to consider.

*Issues for Consideration*

The members of ACEC support the FHWA's efforts to examine current regulations and standards relating to work zones, and we request input as the agency takes further steps to improve their design and management. In particular, ACEC requests input in the development of alternative design strategies and practices, if undertaken by FHWA.

ACEC has some general comments regarding the ANPRM:

- The members of ACEC believe that there should be a national policy to promote improved mobility and safety in work zones, and a national definition is also appropriate. Consideration should be given to incorporating the policy into the regulation.
- Any regulations should be performance based, focused on outcomes and not on specific methods. Guidance documents with appropriate flexibility should be used in advancing specific methods and procedures.
- Better planning of work zones is needed in the early phases of design. Risks to drivers and workers from work zones should be carefully considered in developing design alternatives and Traffic Control Plans.
- ACEC supports using a life cycle approach, including better quality materials and construction techniques that improve durability and reduce the need for recurrent road construction and maintenance work.
- Consideration should be given to how new regulations for work zones will affect design/build projects. Again, an outcome-oriented approach to the regulations is recommended.

Again, the members of ACEC look forward to working with FHWA on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'T.J. Schulz', written in a cursive style.

T.J. Schulz

Director of Transportation Programs